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CPNI Version 1.0ACPS Dec-2007

Customer Proprietary Network Information (CPNI)
Statement of CPNI Compliance
Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual Certification Processes Summary Certification for 2012 covering the prior calendar year 2011

The Statements below describe the operating procedures and actions taken to ensure that Century Enterprises, Inc. is in compliance with the FCC's CPNI Rules

A. Employee CPNI Training	Century Enterprises, Inc. (CEI) is Mid Century Telephone Cooperative, Inc. (MCTC) subsidiary long distance company; as such, CEI has no employees. CEI does have a CPNI Policies and Procedures Manual. Any CEI long distance CPNI related training is conducted in conjunction with Mid Century Telephone all employee CPNI training. Employee training is documented and properly retained.
B. Disciplinary – Improper Disclosure of CPNI	CEI is Mid Century Telephone Cooperative, Inc.' subsidiary long distance company; as such, CEI has no employees. As stated and practiced in accordance with MCTC's Employee Handbook Section III. Employee Rules, #3. Disregard For Customer Relations –“...a breach of the confidentiality of a customer account will not be condoned and will result in immediate discipline.” Infractions of MCTC's CPNI policies will be reported to the CEO and a record will be made of the infraction(s) and disciplinary steps will be taken and documented. There were no MCTC CPNI employee infractions for year 2011.
C. Process for Opt-in and Opt-out	CEI markets to its customers using the Opt-out approach, when applicable. CEI does not participate in 3 rd party marketing and therefore Opt-in has not been utilized. As required by CPNI rules, an Opt-out letter and Opt-out form are required to be mailed every 2 years. Mid Century complied with its scheduled mailing of these documents in December 2011. *Mid Century will honor any customer CPNI election it receives by recording the restriction or non-restriction to the company and to its affiliate companies, including CEI, customer account records. On its own behalf, CEI will also mail Opt-out notification documents to customers when it runs certain sales or marketing campaigns. There were no applicable sales or marketing campaigns for year 2011. Occasionally, a CEI representative may ask the customer for oral consent to use the customer's CPNI for the purposes of providing the customer with an offer for products or services not related to the telephone services

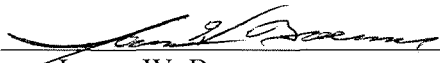
C. Process for Opt-in and Opt-out-cont.	to which the customer subscribes. If customer oral consent is granted, we may use the customer's CPNI for the duration of such telephone call in order to offer additional services. Detailed comments will be noted to customer accounts when Opt-out letter and Opt-out form is mailed, when an Opt-out election form is received from a customer, or when using oral consent.
D. Actions taken against data brokers (Pretexters)	No known Pretexter violations (breaches) occurred to necessitate any such actions for the year 2011.
E. Pretexters process(es) – attempt to access CPNI	No known access to CPNI by Pretexters (breaches) was reported for the year 2011.
F. Customer Complaints – Unauthorized release of CPNI	No customer complaints were received as a result of unauthorized release of CPNI for 2011.
G. Process to ensure Opt-out elections are recorded & followed	Customers may call our business office, or our 24/7 voicemail CPNI line, come in to one of our business office locations, e-mail us, utilize the Opt-out form that is mailed to them, or access the form on our website in order to deny or approve our use of the customer's CPNI to offer products or services not related to the telephone services to which the customer currently subscribes. Service order processing and Customer Service Representative procedures are in place in MCTC's billing system to record Opt-out elections and are strictly practiced on a daily basis. Follow-up verification of Opt-out restrict or un-restrict may be viewed by authorized personnel within a customer's account in the billing system. Billing system reporting capabilities ensure extraction of customer's Opt-out elections as necessary. Record of approval or disapproval is retained for a minimum of 3 years.
H. Other CPNI Compliance measures	<p>Access to customer CPNI is limited to authorized personnel and restriction pass codes are used to facilitate safeguard assurance. Release of call detail information, including, but not limited to, the establishment of password protection and a secret question and answer have been implemented. The customer password is not derived from readily available biographical or account information. Notification of customer account changes is strictly practiced on a daily basis.</p> <p>Mid Century's CPNI enhancements to its billing software and online access include safeguard provisioning for its affiliate companies.</p> <p>Past enhancements to Mid Century's customer online account access provide that a Customer Service Representative authenticate, register, and provide system-generated passwords to customers seeking online access. Additionally, incorporated into the online system, a prompt is sent through to the billing system in a process to send customer notification letters for online account changes when applicable.</p> <p>For year 2011, billing software enhancements include:</p> <ul style="list-style-type: none"> ❖ Implemented a new Payment Processor, credit card platform, which ensures customer credit card information is safeguarded and limited in scope to the last four digits of the card number and

H. Other CPNI Compliance measures-cont.	<p>expiration month/year. MCT does not store credit card details on its server. Customers may set up their own credit card payment processing account and pass phrase via MCT's online bill payment software (Estatement).</p> <ul style="list-style-type: none"> ❖ Online access to Payment Processor and Estatement is blocked after six consecutive unsuccessful attempts to log on. Once blocked, a customer must contact our business office to delete the account and re-establish a new account. ❖ Red Flag Program restricts and controls the display of customer social security and bank information to all but authorized users. ❖ Mid Century's long distance provider, ANPI ZONE, on behalf of Mid Century's long distance subsidiary, Century Enterprises, Inc. implemented blocking precautions to calls terminating to fraudulent international numbers to mitigate fraud/abuse.
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Form 499 Filer ID: 808474

Date Filed: January 27, 2012

Signed:



 James W. Broemmer
 Executive Vice President/CEO

Reference CEI CPNI Policies and Procedures Manual Section VII. Annual Certification